



PLAINTIFF'S EXHIBIT

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Annie Alonso &lt;annie@sllawfirm.com&gt;

**Fwd: Nieves v. Carmel Clay Schools, MEET AND CONFER COMMUNICATION**

1 message

**Jonathan Little** <jon@sllawfirm.com>

Tue, Apr 13, 2021 at 5:43 PM

To: Annie Alonso &lt;annie@sllawfirm.com&gt;, Gaby Olshemski &lt;gaby@sllawfirm.com&gt;, Jessica Wegg &lt;jessica@sllawfirm.com&gt;

[REDACTED]

----- Forwarded message -----

From: **Jonathan Little** <jon@sllawfirm.com>

Date: Wed, Jul 8, 2020 at 8:11 AM

Subject: Nieves v. Carmel Clay Schools, MEET AND CONFER COMMUNICATION

To: Jessica Williams Schnelker <[jschnelker@cchalaw.com](mailto:jschnelker@cchalaw.com)>Cc: Kelly Cain <[KCain@cchalaw.com](mailto:KCain@cchalaw.com)>, [jessica@sllawfirm.com](mailto:jessica@sllawfirm.com) <[jessica@sllawfirm.com](mailto:jessica@sllawfirm.com)>, [ribon@sllawfirm.com](mailto:ribon@sllawfirm.com) <[ribon@sllawfirm.com](mailto:ribon@sllawfirm.com)>, [gbdavis@gbd.law](mailto:gbdavis@gbd.law) <[gbdavis@gbd.law](mailto:gbdavis@gbd.law)>, [smandarich@gbd.law](mailto:smandarich@gbd.law) <[smandarich@gbd.law](mailto:smandarich@gbd.law)>, Libby L. Roberts <[lroberts@cchalaw.com](mailto:lroberts@cchalaw.com)>

Jessica -

Next week is fine to talk about this, but generally:

- a. Your decision to limit the productions to August 2017 to July 2018 is totally arbitrary and is inappropriate; we have every right to get everything Carmel has on Goelz - you have no good faith reason for withholding all of Goelz emails in your client's possession. Further, as for post-July 2018 documents, we are clearly alleging that our client was injured by the Carmel Schools ostracizing her and her family - that damage is ongoing and all post-2018 communication responsive to our requests is relevant and likely admissible to support our claims that Carmel Clay, particularly their swimming community, circled the wagons to make Gabriela's life miserable.
- b. Our Title 9 claim is based on Carmel's 41 year history of having child rapists coach their swim teams and not doing anything about it - so the info about Ray Lawrence et al is entirely germane to that claim and you guys know it - you can not make Rule 11 accusations against me and then not produce the documents that support the accusations in our complaint.
- c. The settlement agreements we requested are available as public information - we could make an APRA request and get them, but that is unnecessary - so just please produce them. Also, just FYI, I have no intention of keeping these documents confidential if I have to get them through an APRA request.
- d. Carmel has a serious problem of coaches raping kids generally - again we know of a soccer coach, a cross country coach, and a basketball coach, in addition to the numerous swim coaches who have been criminally charged or publicly accused of raping children - again, you cannot make Rule 11 accusations against me then hide the documents which clearly validate the accusations in our complaint. Please produce all the documents in your client's possession for any coach, or teacher who has allegations of raping students at the Carmel Clay Schools. There is a public need to get these documents into the record to protect future children - for example, Carmel knew Ray Lawrence was a rapist but then let him go on to Speedway and have access to kids there for over a decade, the public has a right to know who is teaching their children and clearly Carmel has no problem passing rapists to other school systems.
- e. You over-designated documents as confidential - some of the most ridiculous include documents like public announcements of child athletes who got great grades; please revise your designation of confidential documents.

There is a lot of discovery to do in this case - let's get on with it.

On Wed, Jul 8, 2020 at 9:25 AM Jessica Williams Schnelker <[jschnelker@cchalaw.com](mailto:jschnelker@cchalaw.com)> wrote:

Hi Jon,

We are tied up in depositions and other deadlines the remainder of this week. Can we set a call on this Monday morning before the pretrial conference with the Court? We would appreciate a more succinct list of any issues you find with the responses before the call so that we can walk through each of them individually.

Thanks,

Jessica

**Jessica Williams Schnelker | Attorney**

**Church Church Hittle + Antrim**

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**From:** Jonathan Little <[jon@sllawfirm.com](mailto:jon@sllawfirm.com)>  
**Sent:** Tuesday, July 7, 2020 8:30 PM  
**To:** Kelly Cain <[KCain@cchalaw.com](mailto:KCain@cchalaw.com)>  
**Cc:** [jessica@sllawfirm.com](mailto:jessica@sllawfirm.com); [ribon@sllawfirm.com](mailto:ribon@sllawfirm.com); [gbdavis@gbd.law](mailto:gbdavis@gbd.law); [smandarich@gbd.law](mailto:smandarich@gbd.law); Libby L. Roberts <[lroberts@cchalaw.com](mailto:lroberts@cchalaw.com)>; Jessica Williams Schnelker <[jschnelker@cchalaw.com](mailto:jschnelker@cchalaw.com)>  
**Subject:** Re: Nieves - Discovery Responses

Jessica

Never mind I found the attachments - my mistakes

We are going to have a lot of meet and confers and motions to compel coming - your decision to limit the time frame of your discovery searches from August 2017- to July 2018 is arbitrary and inappropriate for starters..What time shall we have our meet and confer call? I am free tomorrow morning, most of the day Thursday and Friday.

Jon

On Tue, Jun 30, 2020 at 4:47 PM Kelly Cain <[KCain@cchalaw.com](mailto:KCain@cchalaw.com)> wrote:

Good afternoon all,

Saeed & Little, LLP Mail: FWD: [REDACTED] Carmel City Schools SUEZ AND RFP COMMUNIATION

Attached please find the School's RFP Responses and Exhibit Index. Below please find the link to the responsive exhibit. The link is set to expire on **July 30<sup>th</sup>**. The password is Nieve RFPRe p630. Please let me know if there are any issues accessing the link.

<https://cchalaw-my.sharepoint.com/:f/p/kcain/EI63TsgXQyRDtDjd2m2591ABDbflfHJyDzUdf72Pytx2PQ?e=RPKRiQ>

Thank you,

Kelly Cain

Legal Assistant

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